

exploitation.¹

3. The exploitation of victims of sex trafficking and prostitution most often does not occur solely at the hands of the traffickers and sex buyers. Rather, hotels often play an equal hand in the exploitation of these victims.

The Role of the Hotel Industry and Defendant Hotels

4. Defendants are aware of the important role that hotels play in the proliferation of sex trafficking and of the revenue they derive from sex trafficking that occurs at their hotels. Today, sex trafficking is pervasive in the United States, and hotels are the primary place where it happens.² For years, sex traffickers have “been able to reap these profits with little risk when attempting to operate within hotels.”³ In 2014, 92% of calls received by the National Human Trafficking Hotline involved reports of sex trafficking taking place at hotels.⁴ Hotels have been found to account for over 90% of commercial exploitation of children.⁵ Defendants knowingly facilitate and

¹ INT’L LABOUR OFFICE, *Global estimates of modern slavery: Forced labour and forced marriage*, at 9, 38, https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf.

² “This is not only a dominant issue, it’s an epidemic issue.” See Jaclyn Galucci, Human Trafficking is an Epidemic in the U.S. It’s Also Big Business, *Fortune*, April 2019, at <https://fortune.com/2019/04/14/human-sex-trafficking-us-slavery/> citing Cindy McCain, who chairs the McCain Institute’s Human Trafficking Advisory Council. “It’s also something that is hiding in plain sight. It’s everywhere—it’s absolutely everywhere.” *Id.*

³See Human Trafficking in the Hotel Industry, Polaris Project, February 10, 2016, at <https://polarisproject.org/blog/2016/02/10/human-trafficking-hotel-industry>; see also Eleanor Goldberg, You Could Help Save A Trafficking Victim’s Life With Your Hotel Room Pic, *Huffington Post*, June 2016, at http://www.huffingtonpost.com/entry/taking-a-photo-of-your-hotel-room-could-help-save-a-trafficking-victims-life_us_57714091e4b0f168323a1ed7

⁴ Michele Sarkisian, Adopting the Code: Human Trafficking and the Hotel Industry, *Cornell Hotel Report*, October 2015, at <https://scholarship.sha.cornell.edu/cgi/viewcontent.cgi?article=1222&context=chrrpubs> Oct. 2015

⁵ See Erika R. George and Scarlet R. Smith, In Good Company: How Corporate Social Responsibility Can Protect Rights and Aid Efforts to End Child Sex Trafficking and Modern Slavery, 46 N.Y.U. J. Int’l L. & Pol. 55, 66-67 (2013).

benefit financially and otherwise from sex trafficking at their locations and the specific location complained of herein.

5. To address the crisis of sex trafficking at hotels, multiple agencies and organizations who actively combat sex trafficking, including the United States Department of Homeland Security, the National Center for Missing and Exploited Children, the Polaris Project, the Georgia and Texas Attorney General, Love 146, EPCAT, among others, have established recommended policies and procedures for recognizing the signs of sex trafficking.⁶

6. Some of the policies and procedures recommended to the Hotel Industry and Defendants designed to reduce or eliminate sex trafficking on their premises include learning to identify warning signs and indicators of sex trafficking, including but not limited to:⁷

- Individuals show signs of fear, anxiety, tension, submission, and/or nervousness;
- Individuals show signs of physical abuse, restraint, and/or confinement;
- Individuals exhibit evidence of verbal threats, emotional abuse, and/or being treated in a demeaning way;
- Individuals show signs of malnourishment, poor hygiene, fatigue, sleep deprivation, untreated illness, injuries, and/or unusual behavior;
- Individuals lack freedom of movement or are constantly monitored;
- Individuals avoid eye contact and interaction with others;

⁶ <https://www.dhs.gov/blue-campaign>; United States Department of Homeland Security Blue Campaign – One Voice. One Mission. End Human Trafficking. Source: <https://www.dhs.gov/sites/default/files/publications/blue-campaign/toolkits/hospitality-toolkit-eng.pdf>; <https://www.missingkids.org/theissues/trafficking#riskfactors>; <https://love146.org/wp-content/uploads/2017/04/Hospitality-Red-Flag-and-Reporting-Love146.pdf>; <https://law.georgia.gov/key-issues/human-trafficking/human-trafficking-red-flags>; https://www2.texasattorneygeneral.gov/files/human_trafficking/human_trafficking_red_flags_handout.pdf

⁷ *See Id.*

- Individuals have no control over or possession of money or ID;
- Individuals dress inappropriately for their age or have lower quality clothing compared to others in their party;
- Individuals have few or no personal items—such as no luggage or other bags;
- Individuals appear to be with a significantly older “boyfriend” or in the company of older males;
- A group of girls appears to be traveling with an older female or male;
- A group of males or females with identical tattoos in similar locations. This may indicate “branding” by a trafficker;
- Drug abuse or frequent use of “party drugs” such as GHB, Rohypnol, Ketamine, MDMA (Ecstasy), Methamphetamines, Cocaine, and Marijuana;
- Possession of bulk sexual paraphernalia such as condoms or lubricant;
- Possession or use of multiple cell phones; and
- Possession or use of large amounts of cash or pre-paid cards.

7. Jane Doe T.M. was trafficked at a hotel owned and operated by Defendants while exhibiting numerous signs and behaviors consistent with these recommendations in the presence of Defendants’ employees and agents.

The Solution

8. The Trafficking Victims Protection Reauthorization Act (TVPRA) has provided civil remedies at the federal level since 2003 by “allow[ing] trafficking victims to sue their traffickers for money damages in federal court.”⁸

⁸ Abigail K. Coker, Anaid Reyes Kipp, Torts, 38 Ga. St. U.L. Rev. 241, 242 (2021); ALEXANDRA F. LEVY, HUM. TRAFFICKING LEG. CTR., FEDERAL HUMAN TRAFFICKING CIVIL LITIGATION: 15 YEARS OF THE PRIVATE RIGHT OF ACTION 7 (Martina R. Vandenberg & Andrew B. Cherry eds., 2018) [hereinafter LEVY REPORT], <https://www.htlegalcenter.org/wp-content/uploads/Federal-Human-Trafficking-Civil-Litigation-1.pdf> [https://perma.cc/JX6U-34H2]

9. In 2008, Congress amended the TVPRA to expand its scope through creation of “beneficiary” liability, providing sex-trafficking victims with a cause of action to sue defendants who—though not criminally liable under the TVPRA—benefited from “participation in a venture which that person knew or should have known” was engaged in criminal sex trafficking.

10. Since adoption of the TVPRA, at least forty states and the District of Columbia have followed suit and allowed for state civil lawsuits.⁹ Fortunately, Georgia has followed the Federal Government’s lead in recognizing that actors other than actual traffickers and Johns, were participating in, promoting, facilitating, and benefitting from the selling of sex and sex trafficking through passing SB 33. With the passing of SB 33, now codified as O.C.G.A. § 51-1-56, Georgia now joins those states in providing trafficking victims the option to pursue civil suits.¹⁰

11. To hold traffickers and the facilitators and promoters of prostitution responsible, the Georgia legislature enacted Chapter 1 of Title 51 of the Official Code of Georgia Annotated, Section 51-1-56, a provision that allows Jane Doe T.M. to bring claims against all who participated, promoted, facilitated, or benefitted from her trafficking.

12. O.C.G.A. § 51-1-56 expands the list of entities that can be held liable for human trafficking beyond those potentially criminally liable under Code section 16-5-46.¹¹ For example,

⁹ Id.; Electronic Mail Interview with Jonathan Todres, Distinguished Univ. Professor & Professor of L., Ga. State Univ. Coll. of L. (May 25, 2021) (on file with the Georgia State University Law Review) [hereinafter Todres Interview]; 164 AM. JUR. Trials § 295, Westlaw (database updated May 2021).

¹⁰ Id.; 2021 Ga. Laws Act 28.

¹¹ Id.; O.C.G.A. § 51-1-56(a)(2) (Supp. 2021); § 16-5-46 (2019).

possible third parties include motel owners, hotels, doctors, labor recruiters, and others.¹² In 2020, 48% of the defendants in civil sex trafficking suits were hotels.¹³

13. By allowing victims to file suits against third parties, O.C.G.A. § 51-1-56 aims to deter businesses, like hotels and trucking companies, from knowingly or inadvertently being involved in trafficking rings.¹⁴ Allowing trafficking survivors to sue in civil court “is an important measure because often the criminal justice process does not provide any remedy to victims and survivors.”¹⁵ For example, federally, Congress created a civil cause of action in the TVPA “on the belief ‘that the additional enforcement activity resulting from private civil actions [would be] worthwhile.’”¹⁶

14. O.C.G.A. § 51-1-56 seeks to hold those who engage in and those who benefit from prostitution and sex trafficking accountable to the resulting victims.¹⁷ O.C.G.A. § 51-1-56 focuses on the “trafficking of persons” and is a cause of action that focuses on conduct that constitutes an underlying criminal offense.

¹² Id.; LEVY REPORT, *supra* note 10, at 22.

¹³ Id.; KYLEIGH FEEHS & ALYSSA CURRIER WHEELER, 2020 FED. HUMAN TRAFFICKING REP. 55 (2021) [hereinafter 2020 FEDERAL HUMAN TRAFFICKING REPORT], <https://www.traffickinginstitute.org/wp-content/uploads/2021/06/2020-Federal-Human-Trafficking-Report-Low-Res.pdf> [<https://perma.cc/P5AT-W2J4>].

¹⁴ Id.; Telephone Interview with Sen. Clint Dixon (R-45th) (May 27, 2021) (on file with the Georgia State University Law Review) [hereinafter Dixon Interview]; 18 U.S.C. § 1595.

¹⁵ Id.; Todres Interview, *supra* note 10.

¹⁶ Id.; ALEXANDRA F. LEVY, HUM. TRAFFICKING LEG. CTR., FEDERAL HUMAN TRAFFICKING CIVIL LITIGATION: 15 YEARS OF THE PRIVATE RIGHT OF ACTION 7 (Martina R. Vandenberg & Andrew B. Cherry eds., 2018) [hereinafter LEVY REPORT], <https://www.htlegalcenter.org/wp-content/uploads/Federal-Human-Trafficking-Civil-Litigation-1.pdf> [<https://perma.cc/JX6U-34H2>], (quoting H.R. REP. 108-264, pt. 2, at 16 (2003)). But see Todres Interview, *supra* note 10 (suggesting that the threat of civil liability is not known to deter human trafficking).

¹⁷ Id.; 2021 Ga. Laws Act 28.

15. O.C.G.A. § 51-1-56 mirrors the TVPA's provision (the federal human trafficking statute), so that an identical statute can apply in state courts for actors who would not be subject to federal jurisdiction.¹⁸

16. In all interpretations of statutes, the courts shall look diligently for the intention of the General Assembly, keeping in view at all times the old law, the evil, and the remedy.¹⁹ Thus, O.C.G.A. § 51-1-56 should be liberally construed and applied to promote their underlying purpose to protect persons from human trafficking/compelled prostitution and provide adequate remedies to victims of human trafficking/compelled prostitution.

17. The criminal justice system has been bearing the cross in the fight against the selling of sex and sex trafficking for far too long by prosecuting the traffickers, prostitution promoters, and sex buyers. It is now time for the civil justice system to hold those who profit from this sex trafficking and prostitution industry accountable for their wrongful conduct.

18. Overall, O.C.G.A. § 51-1-56 is an important step forward in the broader fight against human trafficking, and it will enable some survivors to finally secure a remedy for the harms inflicted on them.²⁰

19. For these reasons, and with great strength and courage, Jane Doe T.M. brings suit under O.C.G.A. § 51-1-56, TVPRA under 22 U.S.C. § 7102, and related causes of action.

¹⁸ Id.; Video Recording of Senate Judiciary Committee Meeting at 43 min., 44 sec. (Feb. 8, 2021) [hereinafter Senate Judiciary Committee Video] (remarks by Trey Bennett, Deputy Exec. Couns., Off. of Governor Brian P. Kemp), <https://www.youtube.com/watch?v=7qSUQ8F8QEM&t=3208s>

¹⁹ O.C.G.A. § 1-3-10

²⁰ Id.; See Todres Interview, *supra* note 10.

II. PARTIES

A. PLAINTIFF

20. Plaintiff Jane Doe T.M. was at all relevant times a trafficked person as that term is defined in O.C.G.A. § 51-1-56 and TVPRA 22 U.S.C. § 7102. Jane Doe T.M. is a resident of Atlanta, Georgia. Given the nature of these allegations, this complaint identifies Jane Doe T.M. as “Jane Doe T.M. or Jane Doe” throughout. She may be contacted through her lead counsel, whose information is contained below.

21. There is a collective and compelling interest in keeping Jane Doe T.M.’s identity anonymous.

B. THE HOTEL DEFENDANTS

G6 HOSPITALITY LLC

22. G6 Hospitality LLC is a for-profit Delaware Corporation with its principal place of business in Carrollton, Texas.

23. All references to G6 Hospitality LLC include any department, division, office, agency, subsidiary, or corporate affiliate whether domestic, foreign, and/or international. The term also includes any director, officer, agent (either with direct/actual authority and implied/apparent authority), employee, person, firm, or corporation acting on behalf of G6 Hospitality LLC now or at any time relevant to the claims herein.

24. Defendant G6 Hospitality LLC may be served through its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

G6 HOSPITALITY FRANCHISING, LLC

25. G6 Hospitality Franchising, LLC is a for-profit Delaware Corporation with its principal place of business in Carrollton, Texas.

26. All references to G6 Hospitality Franchising, LLC include any department, division, office, agency, subsidiary, or corporate affiliate whether domestic, foreign, and/or international. The term also includes any director, officer, agent (either with direct/actual authority and implied/apparent authority), employee, person, firm, or corporation acting on behalf of G6 Hospitality Franchising, LLC now or at any time relevant to the claims herein.

27. Defendant G6 Hospitality Franchising, LLC may be served through its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

G6 HOSPITALITY IP, LLC

28. G6 Hospitality IP, LLC is a for-profit Delaware Corporation with its principal place of business in Carrollton, Texas.

29. All references to G6 Hospitality IP, LLC include any department, division, office, agency, subsidiary, or corporate affiliate whether domestic, foreign, and/or international. The term also includes any director, officer, agent (either with direct/actual authority and implied/apparent authority), employee, person, firm, or corporation acting on behalf of G6 Hospitality IP, LLC now or at any time relevant to the claims herein.

30. Defendant G6 Hospitality IP, LLC may be served through its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

G6 HOSPITALITY PROPERTY, LLC

31. G6 Hospitality Property, LLC is a for-profit Delaware Corporation with its principal place of business in Carrollton, Texas.

32. All references to G6 Hospitality Property, LLC include any department, division, office, agency, subsidiary, or corporate affiliate whether domestic, foreign, and/or international. The term also includes any director, officer, agent (either with direct/actual authority and implied/apparent authority), employee, person, firm, or corporation acting on behalf of G6 Hospitality Property, LLC now or at any time relevant to the claims herein.

33. Defendant G6 Hospitality Property, LLC may be served through its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

G6 HOSPITALITY PURCHASING, LLC

34. G6 Hospitality Purchasing, LLC is a for-profit Delaware Corporation with its principal place of business in Carrollton, Texas.

35. All references to G6 Hospitality Purchasing, LLC include any department, division, office, agency, subsidiary, or corporate affiliate whether domestic, foreign, and/or international. The term also includes any director, officer, agent (either with direct/actual authority and implied/apparent authority), employee, person, firm, or corporation acting on behalf of G6 Hospitality Purchasing, LLC now or at any time relevant to the claims herein.

36. Defendant G6 Hospitality Purchasing, LLC may be served through its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

MOTEL 6 OPERATING LP

37. Motel 6 Operating LP is a for-profit Delaware Corporation with its principal place of business in Carrollton, Texas.

38. All references to Motel 6 Operating LP include any department, division, office, agency, subsidiary, or corporate affiliate whether domestic, foreign, and/or international. The term also includes any director, officer, agent (either with direct/actual authority and implied/apparent authority), employee, person, firm, or corporation acting on behalf of Motel 6 Operating LP now or at any time relevant to the claims herein.

39. Defendant Motel 6 Operating LP may be served through its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

UNITY PLUS, LLC

40. Unity Plus, LLC is a for-profit Georgia limited liability company with its principal place of business in Norcross, Georgia.

41. All references to Unity Plus, LLC include any department, division, office, agency, subsidiary, or corporate affiliate whether domestic, foreign, and/or international. The term also includes any director, officer, agent (either with direct/actual authority and implied/apparent authority), employee, person, firm, or corporation acting on behalf of Unity Plus, LLC now or at any time relevant to the claims herein.

42. Defendant Unity Plus, LLC may be served through its registered agent: Dipak Patel, 2314 Treehaven Drive, Snellville, Georgia 30078.

III. JURISDICTION AND VENUE

43. This Honorable Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, because this action arises under the Constitution, laws, or treaties of the United States (with an amount in controversy that exceeds \$75,000.00).

44. This is a civil action alleging, *inter alia*, violations of 18 U.S.C. § 1595.

45. Venue is proper in this district pursuant to 28 U.S.C. § 1391, because a substantial part of the events or omissions giving rise to the claims asserted in this action, including Defendants' misconduct and omissions, occurred in the judicial district where this action is brought.

IV. SEX TRAFFICKING UNDER FEDERAL LAW

46. Sex trafficking is defined by the TVPRA under 22 U.S.C. § 7102, as “the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a commercial sex act and in which the commercial sex act is induced by force, fraud, or coercion.” This definition combines three elements of sex trafficking as a criminal offense: the act, the means, and the purpose.

47. Pursuant to 18 U.S.C. § 1591(a), all who knowingly provide or obtain commercial sex that was provided or obtained through force, fraud, and coercion – or performed by a minor under the age of 18 – are guilty of sex trafficking. This includes, at a minimum, ***both*** the ‘traffickers’ who recruit, harbor, transport, and provide individuals for forced commercial sex work ***and*** the ‘johns’ or ‘buyers’ who obtain, solicit, or patronize forced commercial sex work.²¹

²¹ While the ‘pimps’ or ‘providers’ are often referred to as the ‘traffickers’ and the purchasers are referenced as the ‘johns,’ ‘tricks,’ or ‘buyers’ [and such nomenclature is used herein], under federal law ***both*** categories are ‘traffickers.’

Criminal liability under 18 U.S.C. § 1591(a)(2) also extends to all who knowingly participate in a venture knowing or in reckless disregard of the fact that the venture is engaged in unlawful sex trafficking.

48. Under 18 U.S.C. § 1595(1), a victim of unlawful sex trafficking has a civil cause of action against (1) any “perpetrator” who engaged in a criminal violation of 18 U.S.C. § 1591; or (2) any “beneficiary” who knowing received a benefit from participation in a venture that the person knew or should have known was engaged in sex trafficking.

V. SEX TRAFFICKING UNDER GEORGIA LAW

49. O.C.G.A. § 16-5-46, is the criminal statute pertaining to the “trafficking [of] a person for labor or sexual servitude.”²² According to Code Section 16-5-46, a person commits the offense of trafficking an individual for sexual servitude when that person knowingly benefits financially or by receiving anything of value from the sexual servitude of another.²³

50. Pursuant to O.C.G.A. § 51-1-56(b), an individual who is a victim of a violation of O.C.G.A. §16-5-46, shall have a cause of action against any perpetrator of said violation and may recover damages and reasonable attorney’s fees.²⁴ According to the statute, a “Perpetrator” according to Code Section 51-1-56 means a person or entity that knowingly benefits, financially or by receiving anything of value, from participation in a venture or scheme which such person or entity knew or should have known involved a violation of Code Section 16-5-46.²⁵

²² O.C.G.A. § 16-5-46.

²³ O.C.G.A. § 16-5-46(c)(3).

²⁴ O.C.G.A. § 51-1-56(b).

²⁵ O.C.G.A. § 51-1-56(a)(2).

VI. STATEMENT OF FACTS

51. While most eleven and twelve year old girls are playing with barbies or cabbage patch dolls, Jane Doe T.M. was introduced to the world of sex trafficking. As a young and impressionable child, Jane Doe T.M. was recruited into the world of sex trafficking while waiting at a bus stop. However, it wasn't until she met Richard "JR" Dixon²⁶ (hereinafter, known as "JR"), her trafficker, that she became a constant victim of mental abuse, physical abuse, and sexual assaults at her trafficker's direction for his profit. Viewed as nothing more than a piece of property for the use of others' deviant sexual proclivities, Jane Doe T.M. was a victim of human trafficking.

52. Under the constant threat of terror, Jane Doe T.M. was forced into human trafficking by JR, who forced Jane Doe T.M. to have sex with 'johns' for profit. JR forced and kept Jane Doe T.M. in the bondage of human trafficking by physically assaulting her by burning her with cigarette lighters, beating her until she required medical attention at hospitals, forced her to use drugs during her bondage, not allowing her to keep any money, and by maintaining possession of her identification documents.

53. Between January 2014 and December 2017, Jane Doe T.M. was human trafficked at the Motel 6 located at 5395 Peachtree Industrial Blvd, Norcross, GA 30092 (hereinafter, known as "Motel 6 Norcross").

54. During the time Jane Doe T.M. was trafficked at Motel 6 Norcross, law enforcement came to the motel.²⁷ On June 26, 2014, room 233 was rented to two occupants. When one of the occupants returned to room 233 at approximately 03:20 am, he "found his roommate ...and a

²⁶ This is one of his many aliases.

²⁷ See police report from Norcross Police Department, complaint No. 2014-2355.

prostitute asleep in bed.” The occupant provided a physical description of the prostitute, who was later identified as Jane Doe T.M.

55. During the time Jane Doe T.M. was terrorized and sexual assaulted at Motel 6 Norcross, Jane Doe T.M. was not allowed to go anywhere alone at Motel 6 Norcross, except to pay for the motel rooms or to get a room key. Jane Doe T.M. and JR would purchase the motel rooms using their name and paying in cash or with prepaid cards. It was well known around the city of Norcross, GA, that Motel 6 Norcross was notorious for prostitution and drug distribution and use. Due to it being patently obvious to the Motel 6 Norcross staff that Jane Doe T.M. was being human trafficked for prostitution, the staff would provide Jane Doe T.M. and JR rooms on the second floor, towards the back of the property, where prostitution and drugs ran rampant.

56. It was obvious and known to Motel 6 Norcross that Jane Doe T.M. was being human trafficked for prostitution based on the following: Jane Doe T.M.’s attire; the high traffic of ‘johns’ in and out of her room; Jane Doe T.M. resided at the location for extended periods with only a purse, a few clothing items, and without any luggage; housekeeping was not allowed inside of the room, and was met at the door to provide towels; an absurd amount of condoms found in the trash can; Jane Doe T.M. looked nervous, afraid, and always looked down during her interaction with Motel 6 Norcross staff; and Jane Doe T.M. had visible swelling to her face and blackened eyes, to name a few.

57. The rooms rented to Jane Doe T.M. had high foot traffic. When a new client entered the motel room to sexually assault Jane Doe T.M., her trafficker would wait outside in the parking lot, the staircase, or another room JR booked at the Motel 6 Norcross. Between January 2014

and December 2017, during her stays at Motel 6 Norcross, Jane Doe T.M. saw no less than thirty (30) and up to forty (40) ‘johns’ daily, at least five (5) days a week.

58. At all relevant times, Unity Plus, LLC (hereinafter referred to as “Franchisee”) owned and operated the Motel 6 Norcross as a franchisee of the G6 Hospitality system.

59. At all material times, G6 Hospitality, LLC d/b/a Motel 6, G6 Hospitality Franchising LLC, G6 Hospitality IP, LLC, G6 Hospitality Property, LLC, G6 Hospitality Purchasing, LLC, Motel 6 Operating, LP, (hereinafter collectively referred to as “G6 Hospitality”) participated directly in the operation and management of the Motel 6 Norcross and exercised systematic control over Franchisee (an actual agent of G6) with respect to the operation of the Motel 6 Norcross.

60. G6 Hospitality had, at all relevant times, direct and systemic control over this facility, responsibility for its operations, and corporate knowledge of the events that occurred there. The Motel 6 Norcross is an alter ego, representative, and/or agent of G6 Hospitality. Defendants jointly exercise or have the right to exercise control over business operations, management, supervision, administration, and procedures at the Motel 6 Norcross.

61. G6 Hospitality and Franchisee jointly employ the employees of the Motel 6 Norcross because they jointly exercise a high degree of control over the terms and conditions of their employment. Defendants have a high degree of unified operations at Motel 6 Norcross where Jane Doe T.M. was trafficked for money. Defendants share the common policies and practices complained of throughout this Complaint. Defendants are separately and jointly responsible for compliance with all applicable laws and jointly and severally liable for any damages caused by employees of Motel 6 Norcross.

62. G6 Hospitality jointly retains and exercises control over aspects of the operation of the Motel 6 Norcross directly relevant to Plaintiff's complaint, including but not limited to: a central online reservation system, revenue management tools, loyalty programs, the hotel website, policies and procedures regarding hotel security, policies and procedures regarding identification requirements and payment method requirements, policies and procedures regarding response to signs of human trafficking, training of hotel staff, and requirements for hotel staff to report suspicions of criminal activity.

VII. ASSUMED OR COMMON NAME

63. Jane Doe T.M. brings this petition against each Defendant in their assumed or common name and expressly reserves the right under Georgia Rule of Civil Procedure 9-10-132 and 9-11-15 to substitute the true name of any Defendant if needed or in response to Court Order. Moreover, Jane Doe T.M. expressly invokes the right to amend under the doctrine of misnomer if any Defendants have been properly served but were done so under the wrong legal name.

VII. FACTS REGARDING THE HOTEL DEFENDANTS

A. Human trafficking and sexual exploitation are a rampant, well-known problem in the hotel industry.

64. What Defendants knew or should have known about the sex trafficking that was occurring at the Motel 6 Norcross, including the venture that trafficked Jane Doe T.M., is shaped by the widely known and pervasive relationship between the hotel industry and sex trafficking.

65. 75% of survivors responding to Polaris’s survey reported coming into contact with hotels at some point during their exploitation...Unfortunately, 94% also disclosed that they never received any assistance, concern, or identification from hotel staff.” See The Polaris Project.²⁸

66. Upon information and belief, reports by The Polaris Project were received and reviewed by the executives, directors, and managers of Defendants.

67. As described herein, sex trafficking is pervasive in the United States, and the hotel industry, and Defendants knew their hotels were the primary place where it happens.

68. Recognizing the unique vantage point that hotel owners and staff have to identify potential human trafficking victims on their properties, the major hotel chains, including franchisors, franchisees, and owner/operators, have told the public they have accepted the unique opportunity and responsibility to stop facilitating sex trafficking. In order to meet that responsibility, major hotel chains, including Defendants have adopted robust anti-human trafficking policies to train its employees to identify and properly respond to the “red flags” of sex trafficking. Each and every Defendant named herein had the opportunity and responsibility to adopt, implement, and enforce similar policies at the Motel 6 Norcross. Unfortunately for Jane Doe T.M., such policies were either not in place or were not enforced.

The Hotel Industry’s Role in Sex Trafficking

69. Today, sex slavery is pervasive in the United States, and hotels are the primary place where it happens.²⁹ For years, sex traffickers have “been able to reap these profits with little risk

²⁸ *Recommendations for Hotels and Motels*, The Polaris Project, <https://polarisproject.org/hotels-motels-recommendations> (last visited June 19, 2019).

²⁹ This is not only a dominant issue, it’s an epidemic issue.” See Jaclyn Galucci, Human Trafficking is an Epidemic in the U.S. It’s Also Big Business, *Fortune*, April 2019, at <https://fortune.com/2019/04/14/human-sex-trafficking-us->

when attempting to operate within hotels.”³⁰ In 2014, 92% of calls received by the National Human Trafficking Hotline involved reports of sex trafficking taking place at hotels.³¹ Hotels have been found to account for over 90% of commercial exploitation of children.³²

70. To address the crisis of sex trafficking at hotels, multiple agencies and organizations who actively combat sex trafficking, including the United States Department of Homeland Security, the National Center for Missing and Exploited Children, the Polaris Project, the Georgia Bureau of Investigation, the Georgia Coalition to Combat Human Trafficking, Love 146, EPCAT, among others, have established recommended policies and procedures for recognizing the signs of sex trafficking and have made hotel operators, including Defendants, aware of this information.³³

71. Some of the recommended policies and procedures intended to reduce or eliminate sex trafficking, include learning to identify warning signs and indicators of sex trafficking, which Defendants were made aware of, including but not limited to:³⁴

- Individuals show signs of fear, anxiety, tension, submission, and/or nervousness;

slavery/ citing Cindy McCain, who chairs the McCain Institute’s Human Trafficking Advisory Council. “It’s also something that is hiding in plain sight. It’s everywhere—it’s absolutely everywhere.” *Id.*

³⁰ See Human Trafficking in the Hotel Industry, Polaris Project, February 10, 2016, at <https://polarisproject.org/blog/2016/02/10/human-trafficking-hotel-industry>; see also Eleanor Goldberg, You Could Help Save A Trafficking Victim’s Life With Your Hotel Room Pic, Huffington Post, June 2016, at http://www.huffingtonpost.com/entry/taking-a-photo-of-your-hotel-room-could-help-save-a-trafficking-victims-life_us_57714091e4b0f168323a1ed7

³¹ Michele Sarkisian, Adopting the Code: Human Trafficking and the Hotel Industry, Cornell Hotel Report, October 2015, at <https://scholarship.sha.cornell.edu/cgi/viewcontent.cgi?article=1222&context=chrpubs> Oct. 2015

³² See Erika R. George and Scarlet R. Smith, In Good Company: How Corporate Social Responsibility Can Protect Rights and Aid Efforts to End Child Sex Trafficking and Modern Slavery, 46 N.Y.U. J. Int’l L. & Pol. 55, 66-67 (2013).

³³ <https://www.dhs.gov/blue-campaign>; United States Department of Homeland Security Blue Campaign – One Voice. One Mission. End Human Trafficking. Source: <https://www.dhs.gov/sites/default/files/publications/blue-campaign/toolkits/hospitality-toolkit-eng.pdf>; <https://www.missingkids.org/theissues/trafficking#riskfactors>; <https://love146.org/wp-content/uploads/2017/04/Hospitality-Red-Flag-and-Reporting-Love146.pdf>; <https://endhtga.org/subcommittees>;

³⁴ *See Id.*

- Individuals show signs of physical abuse, restraint, and/or confinement;
- Individuals exhibit evidence of verbal threats, emotional abuse, and/or being treated in a demeaning way;
- Individuals show signs of malnourishment, poor hygiene, fatigue, sleep deprivation, untreated illness, injuries, and/or unusual behavior;
- Individuals lack freedom of movement or are constantly monitored;
- Individuals avoid eye contact and interaction with others;
- Individuals have no control over or possession of money or ID;
- Individuals dress inappropriately for their age or have lower quality clothing compared to others in their party;
- Individuals have few or no personal items—such as no luggage or other bags;
- Individuals appear to be with a significantly older “boyfriend” or in the company of older males;
- A group of girls appears to be traveling with an older female or male;
- A group of males or females with identical tattoos in similar locations. This may indicate “branding” by a trafficker;
- Drug abuse or frequent use of “party drugs” such as GHB, Rohypnol, Ketamine, MDMA (Ecstasy), Methamphetamines, Cocaine, and Marijuana;
- Possession of bulk sexual paraphernalia such as condoms or lubricant;
- Possession or use of multiple cell phones; and
- Possession or use of large amounts of cash or pre-paid cards.

72. Recognizing the unique vantage point that that hotel owners and staff often have to identify potential human trafficking victims on their properties, several major hotel chains, including franchisors, Franchisee, and owner/operators, have told the public they have accepted

the unique opportunity and responsibility to stop facilitating sex trafficking. In order to meet that responsibility, several (if not most) major hotel chains have adopted robust anti-human trafficking policies to train its employees to identify and properly respond to the “red flags” of sex trafficking. Each Defendant named herein had the opportunity and responsibility to adopt, implement, and enforce similar policies at Motel 6. Unfortunately for Jane Doe T.M., they failed to do so.

The Use of Motel 6 Branded Properties for Sex Trafficking is Prevalent

73. Countless tales of tragedy establish the entrenched, pervasive nature and knowledge of Motel 6’s role as the venue for sex trafficking across the United States for years:

- In 2016 the City of Los Angeles settled a case against G6 for sex trafficking out of a hotel located in Los Angeles.
- In late 2003, a trafficker set up a sex trafficking venture at a Motel 6 in Connecticut in which two (2) young women were sold for sex eight (8) to ten times per day.³⁵
- In April 2009, a sex trafficking venture operated out of a Motel 6 in Toledo, Ohio.³⁶
- In approximately September 2011, sex traffickers set up an operation at a Motel 6 in Toledo, Ohio to sell fifteen (15) and sixteen (16) year old girls for sex.³⁷
- From approximately 2012 through October 2014, two (2) men engaged in a criminal sex trafficking venture of children which operated in part out of a Motel 6 in Harvey, Illinois.³⁸
- Police rescued an eighteen (18) year old girl from a sex trafficker in February 2012, at a Motel 6 in Portland, Oregon.³⁹

³⁵ Amy Fine Collins, *Sex Trafficking of Americans: The Girls Next Door*, Vanity Fair (May 2011), <https://www.vanityfair.com/news/2011/05/human-trafficking-201105>.

³⁶ Five Toledoans Indicted On Sex Trafficking Charges, ABC7Chicago.com (Nov. 7, 2010), <https://abc7chicago.com/archive/7771888/>.

³⁷ Mark Reiter, Two Toledoans Accused Of Juvenile Sex Trafficking, The Blade (Jun. 1, 2010), <https://www.toledoblade.com/Courts/2012/06/02/2-Toledoans-accused-of-juvenile-sex-trafficking-1.html>

³⁸ Press Release, U.S. Dept. of Justice, Two Aspiring Rappers Charged With Operating Sex-Trafficking Ring In Chicago And Suburbs (Jan. 15, 2016), <https://www.justice.gov/usaondil/file/813771/download>.

³⁹ Press Release, U.S. Dept. of Justice, Tacoma Pimp Sentenced To 25 Years For Sex-Trafficking Two

- The FBI investigated and arrested several individuals in December 2012, for the victimization and human trafficking of several young women and a juvenile at a Motel 6 in Madison, Alabama.⁴⁰
- The Orange County Human Trafficking Task Force busted a criminal enterprise in December 2012 that was selling women for sex out of a Motel 6 in Anaheim, California.⁴¹
- In approximately March 2013, sex traffickers began operating a sex trafficking venture out of Motel 6 locations in Bangor and Portland, Maine.⁴²
- Beginning in approximately May 2013, a fifteen (15) year old runaway was trafficked for sex out of the Motel 6 on Caton Avenue in Baltimore, Maryland.⁴³
- In Richmond County, Georgia a man was arrested at a local Motel 6 in October 2013 and charged with sex trafficking of two young women.⁴⁴
- Police investigated a sex trafficker in March 2014 and ultimately charged him for his crimes including, but not limited to, selling a seventeen (17) year old girl for sex out of a Motel 6 in Roseville, Minnesota.⁴⁵
- In May 2014, two (2) traffickers were arrested at a Motel 6 in Monterey, California after a twenty-one (21) year old woman escaped from their captivity.⁴⁶
- In the summer of 2014, two (2) girls ages fifteen (15) and sixteen (16) were taken from

Victims (Nov. 20, 2013), <https://www.justice.gov/usao-or/pr/tacoma-pimp-sentenced-25-years-sex-trafficking-two-victims>.

⁴⁰ *FBI Investigates Human Trafficking At Madison Hotel*, WHNT News 19 (Dec. 7, 2012), <https://whnt.com/2012/12/07/fbi-investigates-human-trafficking-at-madison-motel/>.

⁴¹ *Suspects Busted in Anaheim Sex Ring*, ABC13 Eyewitness News (Dec. 5, 2012), <https://abc13.com/archive/8909784>.

⁴² Danielle McLean, *What Drives Maine Sex Traffickers' Inhumanity*, Bangor Daily News Maine Focus (Sept. 12, 2016), <https://bangordailynews.com/2016/09/12/mainefocus/what-drives-maine-sex-traffickers-inhumanity/>.

⁴³ Anne Kramer, *Man Faces Prison Time For Sex Trafficking Baltimore Teen*, WBAL News Radio (Apr. 10, 2014), <https://www.wbal.com/article/106578/2/man-faces-prison-time-for-sex-trafficking-baltimore-teen>.

⁴⁴ UPDATE: *Man Arrested For Sex Trafficking*, WRDW.com On Your Side, (Oct. 3, 2013), <https://www.wrdw.com/home/headlines/Man-arrested-for-sex-trafficking-226301261.html>.

⁴⁵ *Man, 25, Is Accused Of Trafficking Teens*, Twin Cities Pioneer Press (Jun. 5, 2014), <https://www.twincities.com/2014/06/05/man-25-is-accused-of-trafficking-teens-2/>

⁴⁶ Felix Cortez and Amy Larson, *Monterey Police: 2 Human Sex Traffickers Arrested After Victim Escapes Motel*, KSBW8 (May 9, 2014), <https://ksbw.com/article/monterey-police-2-human-sex-traffickers-arrested-after-victim-escapes-motel/1054172>.

a children's shelter by a sex trafficker and trafficked out of a Motel 6 in Cutler Bay, Florida.⁴⁷

- A Las Vegas man was charged with sex trafficking two (2) victims, including a seventeen (17) year old girl, in January 2015, out of a Motel 6 in Rapid City, Nevada.⁴⁸
- In February 2015, two (2) men were arrested for sex trafficking a fourteen (14) year old girl at a Motel 6 in Seekonk, Rhode Island.⁴⁹
- A local law enforcement investigation resulted in the rescue of a fifteen (15) year old runaway in February 2015, from a Motel 6 near the Oakland, California airport where she was being sex trafficked.⁵⁰
- In North Charleston, South Carolina, a seventeen (17) year old girl was rescued in March 2015 from a Motel 6 by special agents from the United States Department of Homeland Security. The girl was sold for sex, beaten, and starved by a sex trafficker.⁵¹
- Two men were arrested in March 2015 for sex trafficking a fifteen (15) year old girl at Motel 6 in Austin, Texas.⁵²
- In March 2015, police arrested a man for sex trafficking a runaway seventeen (17) year old at a Motel 6 in Warwick, Rhode Island.⁵³
- Over a fourteen (14) month period ending in approximately April 2015, at the same Motel 6 in Warwick, Rhode Island had seventy-five (75) arrests on its property for

⁴⁷ David Goodhue, Next Stop For Man Accused Of Sex Trafficking 2 Teens: Federal Court, Miami Herald (Sept. 2, 2015), <https://www.miamiherald.com/news/local/news-columns-blogs/deadline-miami/article33360843.html>.

⁴⁸ Las Vegas Man Charged With Human Trafficking In Rapid City, Argus Leader (Jan. 17, 2015), <https://www.argusleader.com/story/news/crime/2015/01/17/las-vegas-man-charged-human-trafficking-rapid-22city/21922915/>.

⁴⁹ Stephen Peterson, RI Man Gets Jail In Sex-Trafficking Case Involving Seekonk Motel (Oct. 28, 2016), http://www.thesunchronicle.com/news/local_news/ri-man-gets-jail-in-sex-trafficking-case-involving-seekonk/article_d7a25494-9d21-11e6-8f94-63e5c74facb3.html.

⁵⁰ Emilie Raguso, Woman Charged In Berkeley Teen Sex Trafficking Case (Dec. 8, 2015), <https://www.berkeleyside.com/2015/12/08/woman-charged-in-berkeley-teen-sex-trafficking-case>.

⁵¹ Melissa Boughton, Police Say Teen Starved, Beaten at North Charleston Hotel; Man Arrested in Sex-Trafficking Case (Mar. 2, 2015), https://www.poastandcourier.com/archives/police-say-teen-starved-beaten-at-north-charleston-motel-man/article_032153eefcb6-5333-9182-926a7f43dfbf.html.

⁵² Lindsay Bramson, Local Teen Saved from Sex Slavery; Two Charged, KXAN Austin (Mar. 6, 2015), <https://www.kxan.com/news/local/austin/local-teen-freed-from-sex-slavery-two-charged/1049580764>.

⁵³ Amanda Milkovits, Massachusetts Man Accused Of Trafficking Teen In Warwick Motel, NewportRI.com (Mar. 24, 2015), <https://www.newportri.com/article/20150324/NEWS/150329666>.

crimes including sex-trafficking.⁵⁴

- Seven (7) people were indicted in January 2016, by a Colorado grand jury for sex trafficking children from 2014 through the summer of 2015, out of hotels in Denver, Colorado, including a Denver area Motel 6.⁵⁵
- In the summer of 2015, a woman was arrested at a Motel 6 in Great Falls, Montana where she was involved in sex trafficking a seventeen (17) year old girl.⁵⁶
- A married couple was indicted in June 2015, for their roles in sex trafficking minor children ages seventeen (17), sixteen (16), and fifteen (15) years old out of a Motel 6 in Everett, Washington.⁵⁷
- In Tuscaloosa, Alabama police rescued a fourteen (14) year old girl from a Motel 6 in June 2015, and a grand jury subsequently charged her assailant with human trafficking and rape.⁵⁸
- In approximately July 2015, sex traffickers sold a fifteen (15) year old girl for sex at a Motel 6 in Pismo Beach, California.⁵⁹
- In November 2015 a man was arrested at a Motel 6 in Ventura, California and was criminally charged with sex trafficking a fifteen (15) year old girl who was found with him.⁶⁰
- In January 2016, a man who operated a criminal venture out of a Motel 6 in Frederick

⁵⁴ Sarah Kaplan, Crime-Ridden Motel 6 In R.I. Will Hand Over Guest List To Police, The Washington Post (Apr. 28, 2015), https://www.washingtonpost.com/news/morning-mix/wp/2015/04/28/crime-ridden-motel-6-in-r-i-will-hand-over-guest-list-to-police/?utm_term=.a804ce3f32a8.

⁵⁵ Hsing Tseng, Seven Indicted By Colorado Grand Jury In Child Sex Trafficking Ring Bust, Fox 31 Denver (Jan. 6, 2016), <https://kdvr.com/2016/01/06/7-indicted-by-colorado-grand-jury-in-child-sex-trafficking-ring-bust/>.

⁵⁶ Andrea Fisher, Woman Caught Up In Human Trafficking Ring Pleads Guilty (Aug. 29, 2016), <https://www.greatfallsbtribune.com/story/news/local/2016/08/29/woman-caught-human-trafficking-ring-pleads-guilty/89566374/>.

⁵⁷ Diana Hefley, County Investigating 45 Ongoing Human Sex Trafficking Cases, HeraldNet (Jun. 26, 2015), <https://www.heraldnet.com/news/county-investigating-45-ongoing-human-sex-trafficking-cases/>.

⁵⁸ Tuscaloosa Man Charged With Rape And Trafficking Mississippi Teen, NewsMississippi (Nov. 7, 28 2014), <https://newsms.fm/tuscaloosa-man-charged-human-trafficking-mississippi-teen/>.

⁵⁹ Matt Fountain, Four Accused Of Pimping Out 15-Year-Old Girl In SLO Will Stand Trial, SanLuisObispo.com (May 5, 2016), <https://www.sanluisobispo.com/news/local/article75832962.html>.

⁶⁰ Fresno Man Sentenced To Prison For Pimping, Human Trafficking In Ventura County, Ventura County Star (Apr. 26, 2016), <https://www.vcstar.com/story/news/local/communities/ventura/2016/04/26/fresno-man-sentenced-to-prison-for-pimping-human-trafficking-in-ventura-county/88714698/>.

City, Maryland was charged with sex trafficking.⁶¹

- Criminal charges were brought against a man who sex trafficked a fifteen (15) year old girl out of a Motel 6 in Beaumont, Texas in March 2016.⁶²
- On March 23, 2016, a victim of a sex trafficking ring died at a Motel 6 in Winchester, West Virginia.⁶³
- The leader of a sophisticated and organized sex trafficking ring beat and raped one of his victims in April 2016, at a Motel 6 in Tinicum Township, Pennsylvania.⁶⁴
- A federal court sentenced a man to ten (10) years in prison in November 2016, for sex trafficking a fifteen (15) year old girl in 2014 out of a Motel 6 in Hartford County, Connecticut.⁶⁵
- Local law enforcement rescued a seventeen (17) year old runaway in December 2016, who was being sex trafficked from a Motel 6 in Gibbstown, New Jersey.⁶⁶
- In February 2017, the leader of a child sex trafficking ring in Tulsa, Oklahoma, was busted at a local Motel 6 where federal authorities rescued a sixteen (16) year old survivor of sex trafficking.
- A forty-five (45) year old man was charged with human trafficking after picking up a teenage boy from school and taking him to a Motel 6 in Cedar Park, Texas in approximately March 2017.⁶⁷

⁶¹ Frederick Police Arrest Man On Human Trafficking Charges, CBS13 Baltimore (Jan. 16, 2016), <https://baltimore.cbslocal.com/2016/01/16/frederick-police-arrest-man-on-human-trafficking-charges/>.

⁶² Quentin Hope, Women Accuse Defendant Of Sex Trafficking, Threatening To Kill Them, KFDM.com (Sept. 11, 2018), <https://kfdm.com/news/local/women-accuse-defendant-of>.

⁶³ Ellie Williams, Martinsburg Man Convicted On Sex Trafficking And Drug Charges, LocalDVM.com (Jan. 17, 2019), <https://www.localdvm.com/news/virginia/martinsburg-man-convicted-on-sex-trafficking-drug-charges/1708490814>.

⁶⁴ Justin Heinze, Man Behind Human Trafficking Ring In Chester County Sentenced, Patch (Sept. 26, 2017), <https://patch.com/pennsylvania/phoenixville/man-behind-human-trafficking-ring-chester-county-sentenced>.

⁶⁵ David Owens, Hartford Man Sentenced To Prison For Sex Trafficking Of 15-Year-Old Girl, Hartford Courant (Nov. 14, 2016), <https://www.courant.com/news/connecticut/hc-sex-trafficking-teenager-prison-1115-20161114-story.html>.

⁶⁶ Matt Gray, Three Indicted On Charges Of Forcing Teen Into Prostitution, NJ.com (Sept. 24, 2017), https://www.nj.com/gloucester-county/index.ssf/2017/09/post_139.html.

⁶⁷ Little Elm Man Accused of Trafficking Austin Teen, KHOU11.com (Sept. 19, 2017), <https://www.khou.com/article/news/local/texas/little-elm-man-accused-of-trafficking-austin-teen/285-476893013>.

- At a Motel 6 in Des Moines, Iowa a man sex trafficked a minor victim in June 2017.⁶⁸
- In approximately June 2017, a seventeen (17) year old runaway was rescued by law enforcement from a Motel 6 in Las Vegas, Nevada out of which a sex trafficker was operating.⁶⁹
- A seventeen (17) year old girl was sold for sex by traffickers at a Motel 6 in Portland, Oregon in June 2017.⁷⁰
- In August 2017, two (2) men operated out of a Motel 6 in Springfield, Virginia to sex traffic a sixteen (16) year old girl.⁷¹
- Two (2) men were arrested in December 2017, for sex trafficking a minor female out of a Motel 6 in Destin, Florida.
- In February 2018, a man engaged in sex trafficking of two (2) women at a Motel 6 near New Orleans, Louisiana.⁷²
- The Columbus City Attorney's Office issued ultimatums in February 2018, to several area hotels to clean up or shut down, including but not limited to, the Motel 6 at 7480 North High Street which, according to police, had been the site of significant criminal activity and is nearby the Motel 6 Columbus.⁷³
- Law enforcement responded to a 911 call from a seventeen (17) year old girl who was calling from the lobby of a Motel 6 in Claremont, California in February 2018. Upon arrival, officers discovered that the seventeen (17) year old caller and a fifteen (15) year

⁶⁸ Luke Nozicka, Seven Des Moines Residents Charged With Sex Trafficking, Feds Say, The Des Moines Register (Jun. 11, 2018), <https://www.desmoinesregister.com/story/news/crime-and-courts/2018/06/11/7-des-moines-residents-charged-sex-trafficking-feds-des-moines-sexual-prostitution-iowa-texas/692264002/>.

⁶⁹ Rachel Crosby, Woman Accused of Sex Trafficking Runaway on Las Vegas Strip, Las Vegas Review-Journal (Jun. 2, 2017), <https://www.reviewjournal.com/crime/sex-crimes/woman-accused-of-sex-trafficking-runaway-on-las-vegas-strip/>.

⁷⁰ Nick Morgan, Accused Human Traffickers Stopped In Medford, Mail Tribune (Jul. 7, 2017), <http://mailtribune.com/news/crime-courts-emergencies/accused-human-traffickers-stopped-in-medford>.

⁷¹ Emily Leayman, 16-Year-Old Forced To Be Prostitute At Springfield Motel: Report, Patch (Feb. 6, 2018), <https://patch.com/virginia/burke/16-year-old-forced-be-prostitute-springfield-motel-report>.

⁷² Emily Lane, Man Accused of Trafficking Took Females to New Orleans To 'Make Some Money for Mardi Gras', Nola.com (Oct. 18, 2018), <https://www.nola.com/crime/2018/10/man-accused-of-trafficking-took-females-to-new-orleans-to-make-some-money-for-mardi-gras-warrant.html>.

⁷³ Maureen Kocot, Columbus Cracks Down On Businesses With High Crime Rates, 10 WBNS (Feb. 7, 2018), <https://www.10tv.com/article/columbus-cracks-down-businesses-high-crime-rates>.

old girl were both being sex trafficked at the hotel.⁷⁴

- In March 2018, police found a ten (10) year old girl wearing a dog collar with a twenty-three (23) year old man who had raped her at a Motel 6 in Lakeland, Florida.⁷⁵
- In Richfield, Minnesota a man was criminally charged in June 2018, for sex trafficking a fifteen (15) year old girl out of an area Motel 6.⁷⁶
- Police busted a human trafficking operation at a Motel 6 in Ann-Arbor, Michigan in July 2018.⁷⁷
- A Motel 6 in Braintree, Massachusetts surrendered its operating license in September 2018, after significant criminal activity, including sex trafficking, was documented occurring on its property.⁷⁸

74. Motel 6 advertises so-called partnerships with anti-trafficking organizations, but internal communications indicate the partnership is more for advertising purposes than actual anti-trafficking efforts. This partnership reflects Defendants' knowledge of the pervasiveness of human trafficking at Motel 6 branded hotels but has not resulted in reasonable actions in response to that knowledge.

75. Similarly, G6 Hospitality knew sex trafficking was occurring at its hotels through publicly available online review websites, which are regularly reviewed by companies such as G6 Hospitality:

⁷⁴ Serena Fangary, Social Media, Sexual Assault, And Sex Trafficking, Webb Canyon Chronicle (May 21 23, 2018), <https://webbcanyonchronicle.com/2953/features/social-media-sexual-assault/>.

⁷⁵ David Neal, Florida Man, Burger King Manager Met His Online Girlfriend For A Hotel Sex Date, Cops Say She's 10., Miami Herald (Mar. 29, 2018), <https://www.miamiherald.com/news/local/community/miami-dade/west-miami-dade/article207303799.html>.

⁷⁶ Man Charged With Sex Trafficking, Prostitution Of 15-Year-Old At Richfield Motel, 5 ABC Eyewitness News (Jun. 19, 2018), <https://kstp.com/news/man-charged-sex-trafficking-richfield-hotel/4955796/>.

⁷⁷ Darcie Moran, Man Charged With Human Trafficking At Ann Arbor-Area Hotel, MLive.com (Dec. 7, 2018), <https://www.mlive.com/news/ann-arbor/2018/12/man-charged-with-human-trafficking-at-ann-arbor-area-hotel.html>.

⁷⁸ Daniel Libon, Motel 6 Ends Fight To Reopen Braintree Location, Patch (Sept. 19, 2018), <https://patch.com/massachusetts/braintree/motel-6-ends-fight-reopen-braintree-location>.

- Regarding an October 2017 stay at a Motel 6 in Albany, New York, a customer wrote: “I would not recommend staying at this Motel 6... we were greeted by gang-bangers and what looked to be several prostitutes hanging about going from room to room.”⁷⁹
- Regarding an August 2019 stay at a Motel 6 in Tallahassee, Florida, a customer wrote: “...drug addicts prostitute it was horrible I will never go back, and I would never send anybody to Motel 6 on Monroe Street”⁸⁰
- Regarding an April 2013 stay at the Motel 6 in Sacramento, California, a customer wrote: “Caters to prostitutes and johns. If you’re a prostitute or john you’ll love this Motel 6... Don’t bother calling Guest Reservations either, because they’ll say they can’t do anything...”⁸¹
- Regarding a September 2019 stay at the Motel 6 in Birmingham, Alabama, a customer wrote: “I didn’t like the idea of the drug trafficking and prostitution that was allowed by staff.”⁸²
- Regarding a November 2017 stay at a Motel 6 near Houston, Texas, a customer wrote: “This cesspool is a neighborhood blight of crack hookers, heroin junkies, human traffickers, transients, dope dealers, and thieves. Blatant drug and prostitution crime bleeding over into the parking lot of the nice shopping center and endangering families from the neighborhoods all around it.”⁸³

76. This sampling of news stories and reviews establishes that G6 Hospitality knew (or at a minimum, certainly should have known):

- a. The use of Motel 6 for sex trafficking and prostitution was not isolated to one location;
- b. The use of Motel 6 for sex trafficking was not isolated to one specific geographic region and was a nationwide problem;

⁷⁹https://www.tripadvisor.com/ShowUserReviews-g29786-d244131-r143824352-Motel_6_Albany-Albany_New_York.html.

⁸⁰ <https://www.booking.com/reviews/us/hotel/tallahassee-2738-north-monroe-street.html>.

⁸¹https://www.tripadvisor.com/ShowUserReviews-g32999-d243533-r158549801-Motel_6_Sacramento_South-Sacramento_California.html.

⁸² <https://www.kayak.com/Birmingham-Hotels-Motel-6-Birmingham---Bessemer.113779.ksp#reviews>.

⁸³https://www.yelp.com/biz/motel-6-houston-north-spring-spring?adjust_creative=trivago&utm_campaign=yelp_feed&utm_medium=feed_v2&utm_source=trivago

- c. Motel 6 was involved with multiple law enforcement investigations involving sex trafficking;
- d. Sex trafficking at Motel 6 inherently involved compelled prostitution; and ⁸⁴
- e. Motel 6 failed to ensure adequate proper policies and procedures were in place and being followed to prevent sex trafficking.

The Use of Motel 6 Norcross for Sex Trafficking Was Well Known

77. It was well known around the city of Norcross, GA, that Motel 6 Norcross was notorious for prostitution and drug distribution and use, and G6 Hospitality was aware or should have been aware of the same.

78. Online reviews specific to the Motel 6 Norcross establish the nature of Motel 6 Norcross's role as the venue for sex trafficking and Defendants' knowledge of the same:

- In 2017, a Google review stated, "STOP!!!!!!!!!!!!!! Don't go there whole lot of prostitutes and cracked out junkies. The owner tried to offer me and my wife a swingers party with party favors included... Omg this is an outrage and something needs to be done about it..smh."⁸⁵
- In 2017, a Google review stated, "Pulled up and first thing I see is a hooker crawling out the window standing there and back in. She continued while we waited and watched. Asked the front desk and was told it was safe as it was in an industrial area. Next was the baggie filled with crystal meth someone dropped. Then they were trying to catch a snake by the bushes. Called other places nearby and they

⁸⁴ "Prostitution and sex trafficking are inextricably linked, and where prostitution is legalized or tolerated, there is a greater demand for human trafficking victims and nearly always an increase in the number of women and children trafficked into commercial sex slavery." H.R. REP. 115-572, 5, 2018 U.S.C.C.A.N. 73, 76.

⁸⁵https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092&gl=us&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABA&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSJzIIMHg4OGY1YTEzMjBmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA

were booked. Went ahead and got a room and weed wreaked down the hallway. Washed clothes and came to check the dryer and my clothes wasn't there. Covers full of burn marks. Overall I did not feel safe and would never stay here again. Upon leaving another couple said the front desk calls them at 2:30 in the morning asking them to check his peephole to see if 2 guys are walking in his hallway. He said he declined telling them he wasn't security. Glad this experience is over.”⁸⁶

- In 2018, a Google review stated, “This hotel should have come with the following warning labels: Beware of Juugs (crackheads), Flush at your own risks - two flushes water was everywhere, After midnight anything goes - Literally at the stroke of 12 the roaches came out like they were doing a raid, When I went outside to smoke a cigarette all the Juugs and prostitutes came out like I was FEMA giving handouts, If you like sleeping with one eye opened this is the place for you.”⁸⁷
- In 2018, a Google review stated, “If you want a weekend staycation or get away... don't do it here. Halls smell like poo. I've had to put staff members in their place for being disrespectful. Rooms are busted. They advertise a pool but never opened because it dilapidated. There's prostitutes hanging around the hotel soliciting people. Drug dealers soliciting folks. It's insane.”⁸⁸

⁸⁶https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSjzIIMHg4OGY1YTEzMjBmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA

⁸⁷https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSjzIIMHg4OGY1YTEzMjBmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA

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- In June 2021, a Expedia review stated, “Looks like doors had been kicked in, had holes in the doors and walls. People standing out watching us while we unpack. Then a white van cans around watching all us women. Seems as if there is some sex trafficking or something going on. Bedding was nasty along with the bathroom. Once reported nothing was fine.”⁸⁹
- In 2018, a Google review stated, “Could hear everyone coming in and out of the rooms loudly... People walking around lobby half dressed.”⁹⁰
- In November 2014, a TripAdvisor review stated, “this hotel had drug dealers, cops shooting, and prostitutes, but it was clean comfortable and near everything we needed when we asked for something it was done quickly we were not harassed and enjoyed our stay GREAT MANAGEMENT.”⁹¹
- In October 2014, a TripAdvisor review stated, “I am 67 years old and I have never stayed in such a terrible place in my entire life! All of the patrons that were walking around in the parking lot and lobby looked to us to be of questionable character. The women were dressed as I would think "ladies of the night" would dress, that

42%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSJzIIMHg4OGY1YTEzMjBmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA

⁸⁹<https://www.expedia.com/Atlanta-Hotels-Motel-6-Norcross.h530412.Hotel-Reviews>

⁹⁰https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSJzIIMHg4OGY1YTEzMjBmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA

⁹¹https://www.tripadvisor.com/Hotel_Review-g35152-d1489495-Reviews-Motel_6_Norcross-Norcross_Georgia.html#REVIEWS

may not be what they were, but that is what their appearance suggested. Thank God we were in a "concealed carry state" or I would NOT have stayed AT ALL!"⁹²

- In July 2022, an Expedia review stated, "Took me a minute to figure it out, but is was being used as a brothel or a crack den or god knows what. I was booked for three nights, but I checked out in the early am and canceled the rest of my stay. I should have left the moment I saw the room. I'll never use hotels.com again and hopefully neither will my friends. How can you be trusted?"⁹³
- In May 2021, an Expedia review stated, "People standing out watching us while we unpack. Then a white van cans around watching all us women. Seems as if there's some sex trafficking or something going on."⁹⁴
- In November 2017, an Expedia review stated, "DO NOT STAY HERE!! Known for drugs and drunks."⁹⁵
- In May 2017, a TripAdvisor review stated, "Upon arriving between 2230 and 2300 the front door of the lobby was locked and I had to check in through a little side window. My first thought is there must be security and safety issues. Check in was quick. My room was 264. Upon driving to my room, I noticed there were lots of people congregating outside with their doors open... My neighbors was were so loud and banging I called the receptionist to complain and I am not a complainer but this was so unbearable. I was told security is on the premises and will be right over to talk to them. Well the noise never stopped."⁹⁶
- In May 2015, a TripAdvisor review stated, "Now let's talk security. Lots of shady individuals frequent this location. Not that I've had a single bad encounter, yet. But the cops were here today and patted down about 25 people and I believe there were a few arrested. My wife and I believe it to be a prostitution problem here at no fault of the hotel."⁹⁷

⁹²https://www.tripadvisor.com/Hotel_Review-g35152-d1489495-Reviews-Motel_6_Norcross-Norcross_Georgia.html#REVIEWS

⁹³<https://www.expedia.com/Atlanta-Hotels-Motel-6-Norcross.h530412.Hotel-Information?pwaDialog=datepicker-start&pwaDialogNested=PropertyDetailsReviewsBreakdownDialog>

⁹⁴<https://www.expedia.com/Atlanta-Hotels-Motel-6-Norcross.h530412.Hotel-Information?pwaDialog=datepicker-start&pwaDialogNested=PropertyDetailsReviewsBreakdownDialog>

⁹⁵<https://www.expedia.com/Atlanta-Hotels-Motel-6-Norcross.h530412.Hotel-Information?pwaDialog=datepicker-start&pwaDialogNested=PropertyDetailsReviewsBreakdownDialog>

⁹⁶https://www.tripadvisor.com/Hotel_Review-g35152-d1489495-Reviews-Motel_6_Norcross-Norcross_Georgia.html

⁹⁷https://www.tripadvisor.com/Hotel_Review-g35152-d1489495-Reviews-or10-Motel_6_Norcross-Norcross_Georgia.html#REVIEWS

- In October 2014, a TripAdvisor review stated, “The halls smell like drugs and from the type of conditions I think they only want drug users/ sellers to stay here.”⁹⁸
- In December 2022, a Kayak review stated, “It look as though it’s drug spot, people outside trippin. I will not stay here again.”⁹⁹
- In April 2021, a Booking.com review stated, “People hanging out every where and the smell of marijuana outside and in the hallways.”¹⁰⁰
- In 2018, a Google review stated, “I don't feel like 1 star is fair, this place deserves, no stars... But before we even checked in i could see signs of dopeheads scurrying about and harassing the guests for some change. NO security in site. Once we arrived in the room we were welcomed by the unmistakable smell of weed. Someone was definitely smoking a fat 1 and i have nothing against it but damn fam it was fogging up our room... If our experience wasn't bad enough, about 12 midnight there was a F***ing brawl out front over someone and his girl.”¹⁰¹
- In 2019, a Google review stated, “For the cost of the stay, I feel there should be more amenities. A renovation should be considered to maybe include a cooktop and better sized refrigerator inside the room. The rooms were clean; however, some of the customers were not, dogs everywhere, and drugs arguing and fighting in hallways.”¹⁰²

⁹⁸https://www.tripadvisor.com/Hotel_Review-g35152-d1489495-Reviews-Motel_6_Norcross-Norcross_Georgia.html

⁹⁹ <https://www.kayak.com/Norcross-Hotels-Motel-6-Norcross-GA.12334.ksp>

¹⁰⁰ <https://www.booking.com/hotel/us/motel-6-norcross-norcross.html#tab-reviews>

¹⁰¹https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Blvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQBA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSJzIIMHg4OGY1YTEzMjBmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA

¹⁰²https://www.google.com/travel/hotels/Motel%206%205395%20Peachtree%20Industrial%20Blvd.%09Norcross%09GA%0930092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?g2lb=2502548,2503771,2503781,4258168,4270442,4284970,4291517,4306835,4429192,4515404,4597339,4718358,4723331,4731329,4757164,4778035,4814050,4861688,4864715,4874190,4886082,4886480,4890098,4893075,4899568,4899570,4902277,4905351,4906050,4920622,4

- In 2018, a Google review stated, “I preferred not to stay even though I drove half way across town for just a place to crash for a few minutes. It's too much trafficking and people hanging out in front of the motel itself.”¹⁰³
- In 2020, a Google review stated, “I had a disappointing experience at this location, the room was dirty. There were dirty underwear left in the bathroom, several roaches among other complaints. Not a good place to stay if you have standards, several suspect people walking around which is very uncomfortable at times. My advice to high class people is to spend more for a better experience with a better hotel brand.”¹⁰⁴
- In September 2018, an Expedia review stated, “They always save the good rooms on the 3rd floor for their family and friends.”¹⁰⁵

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PK&gl=pk&cs=1&ssta=1&q=Motel+6%095395+Peachtree+Industrial+Bvd.%09Norcross%09GA%0930092&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&sa=X&ved=2ahUKEwjz-YGt9tD8AhUJQfEDHZCaCMUQ4gl6BAh1EAU&grf=EnMKNAGMEjASLrIBKxIpCicKJTB4ODhmNWExMTIwZmZmMTRkNToweDg4YTU3MjJiZDhiYTRIN2QKLAGOEigSJnIkKiKBWjnDxABGBISBwjnDxABGBMgADAEQMoCSgcI5w8QARgSCg0IEhIJEgeSAQQIAhAD

¹⁰³[https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-](https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSJzIIMHg4OGY1YTEXmJmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA)

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¹⁰⁴[https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-](https://www.google.com/travel/hotels/motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092/entity/CgsI_Zzpxb3F3NKIARAB/reviews?q=motel%206%205395%20Peachtree%20Industrial%20Bvd%2C%20Norcross%20GA%2030092&g2lb=2502548%2C2503771%2C2503781%2C4258168%2C4270442%2C4284970%2C4291517%2C4306835%2C4429192%2C4515404%2C4597339%2C4731329%2C4757164%2C4778035%2C4814050%2C4850738%2C4861688%2C4864715%2C4874190%2C4886082%2C4886480%2C4893075%2C4902277%2C4902504%2C4906023%2C4920132%2C4924070%2C4926165%2C4926489%2C4936396%2C4962414%2C4964835%2C4964966%2C4965726%2C4965990%2C4968087%2C4972345&hl=en-US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSJzIIMHg4OGY1YTEXmJmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA)

US&gl=us&ssta=1&rp=EP2c6cW9xdzSiAEQ_Zzpxb3F3NKIATgCQABIAcABAg&ictx=1&ved=0CAAQ5JsGahcKEwjgqe7zh9r9AhUAAAAAHQAAAAAQA&utm_campaign=sharing&utm_medium=link&utm_source=htls&ts=CAESABpJCisSJzIIMHg4OGY1YTEXmJmZmYxNGQ1OjB4ODhhNTcyMmJkOGJhNGU3ZBoAEhoSFAoHC OcPEAMYDhIHCOcPEAMYDxgBMgIQACoJCgU6A1VTRBoA

¹⁰⁵<https://www.expedia.com/Atlanta-Hotels-Motel-6-Norcross.h530412.Hotel-Information?pwaDialog=datepicker-start&pwaDialogNested=PropertyDetailsReviewsBreakdownDialog>

- In September 2017, an Expedia review stated, “First and second floor horrible. Third floor was ok. Wouldn’t recommend.”¹⁰⁶

79. Despite the rampant trafficking occurring at its hotels for over a decade, it was not until September 2018, that G6 Hospitality announced that “the company will introduce anti-human trafficking training to corporate, field and property team members. Additionally, the company developed its own training for all property team members to understand how to effectively intervene and identify potential trafficking situations to protect each other, guests and the community.”

80. Even after this announcement, sex trafficking at Motel 6 properties continued:

- In November 2018, federal authorities arrested a man for sex trafficking a woman out of a Motel 6 in San Jose, California.¹⁰⁷
- In December 2018, a husband and wife were arrested for sex trafficking women who were Chinese nationals out of a Motel 6 in Portsmouth, New Hampshire from approximately 2016 through 2017.¹⁰⁸
- A fourteen (14) year old girl was held against her will at a Motel 6 in Raleigh, North Carolina and sex trafficked in or around January 2019.¹⁰⁹

Motel 6 Norcross Facilitated the Trafficking of Jane Doe T.M.

¹⁰⁶<https://www.expedia.com/Atlanta-Hotels-Motel-6-Norcross.h530412.Hotel-Information?pwaDialog=datepicker-start&pwaDialogNested=PropertyDetailsReviewsBreakdownDialog>

¹⁰⁷Alleged Pimp Arrested in San Jose for Sex-Trafficking Young Woman He Found on Instagram, San Jose Inside (Nov. 9, 2018), <https://www.sanjoseinside.com/2018/11/09/alleged-pimp-arrested-in-san-jose-for-sex-trafficking-young-woman-he-found-on-instagram/>.

¹⁰⁸ Elizabeth Dinan, Husband, Wife Charged In Sex Trafficking ‘Scheme’, Fosters.com (Dec. 14, 2018), <https://www.fosters.com/news/20181214/husband-wife-charged-in-sex-trafficking-prostitution-scheme>.

¹⁰⁹ Amanda Lamb, Third Man Arrested In Raleigh Alleged Child Trafficking, WRAL.com, <https://www.wral.com/third-man-arrested-in-raleigh-alleged-child-trafficking/18104963/>

81. During Jane Doe T.M.'s trafficking between January 2014 and December 2017, she was forced by her trafficker to pay for rooms in her name using cash at Motel 6 Norcross. Over this period spanning nearly four years, there were many obvious and apparent signs that Jane Doe was the victim of human trafficking. Despite this, Motel 6 Norcross staff continued providing a venue for Jane Doe's sexual exploitation.

82. Due to it being patently obvious to the Motel 6 Norcross staff that Jane Doe T.M. was being human trafficked for prostitution, the staff would provide Jane Doe T.M. and JR rooms on the second floor, towards the back of the property, where prostitution and drugs ran rampant. Instead of prohibiting this type of activity on their property, Motel 6 Norcross promoted such activity by providing rooms on a floor of the property known for prostitution. This was a specific decision made by the staff at Motel 6 Norcross to assist and support activity they knew or should have known was illegal sex trafficking.

83. The criminal activity was so rampant and acceptable, when a new client entered the motel room to sexually assault Jane Doe T.M., her trafficker would wait outside in the parking lot, the staircase, or another room JR booked at the Motel 6 Norcross. Housekeeping was not allowed to enter the motel room to clean despite there being an absurd number of condoms in the trash can, and simply provided towels at the doorway without entering the rooms. Jane Doe (T.M.) stated this went on at the Motel 6 Norcross over a nearly four-year period between January 2014 and December 2017. Jane Doe T.M. met 30 to 40 buyers each day and was repeatedly sexually assaulted at the Motel 6 Norcross.

Jane Doe's Trafficking at the Subject Motel 6 Could Have Been Prevented.

84. During her trafficking, Jane Doe's trafficker frequently and regularly used the Motel 6 Norcross location because he knew that members of the staff looked the other way, despite the obvious signs of sex trafficking associated with Jane Doe's trafficking at Motel 6. Defendants actively contributed to Jane Doe's ongoing trafficking through acts and omissions that facilitated the work of her traffickers, including, but not limited to, adopting policies and procedures that allowed trafficking to flourish in Motel 6 properties and failing to implement and enforce adequate anti-sex trafficking policies and training despite their actual knowledge they were profiting off sexual exploitation.

85. Defendants are responsible for the acts and omissions of the staff of the Motel 6 Norcross because these acts were committed in the scope and course of employment for Defendants.

86. Defendants are responsible for the acts and omissions of the Motel 6 Norcross staff because Defendants failed to exercise reasonable care regarding the hiring, training, and supervision of these employees, particularly given the risks, known to Defendants, of human trafficking occurring at Motel 6 Norcross.

87. Defendants, through their agents and employees, had an opportunity to and did observe obvious signs of sex trafficking at the Motel 6 Norcross and yet allowed it to continue unabated and facilitated and supported it.

88. Defendants, through their agents and employees, had an opportunity to and did observe obvious signs that Jane Doe T.M. was being trafficked at the Motel 6 Norcross and yet allowed it to continue unabated and facilitated and supported it.

89. Defendants facilitated sex trafficking of Jane Doe T.M. through their failure to adopt, implement, and enforce reasonable and adequate anti-sex trafficking policies and training despite their knowledge of the actual and ongoing problem of sex trafficking at hotel properties, including Motel 6 Norcross.

90. The most effective weapon against sexual exploitation and human trafficking is education and training.¹¹⁰ As ECPAT concluded:

The hospitality industry is in a unique position to identify and report human trafficking due to its perceived anonymity. Traffickers believe they can go unnoticed while exploiting victims across the globe in hotels—ranging from budget properties to luxury resorts. From check-in to check-out there are a number of indicators victims and exploiters exhibit during the time they are on a hotel property.¹¹¹

91. This same conclusion is echoed by others who seek to eliminate or minimize sex trafficking in the hospitality industry, including the American Hotel Lodging Association: “Hotel employees who have undergone training are more aware of trafficking when it happens – and are more willing to report it – than those who have not been trained.”¹¹² In reference to companies like G6 Hospitality ECPAT observed: “If they do nothing to raise awareness or to prevent child trafficking, they risk becoming an indirect and unintentional conduit for the abuse that takes place.”

92. If G6 Hospitality had adequately trained and implemented guidelines, “red flags,” training policies and procedures, and other recommendations adopted in the industry, G6

¹¹⁰ <https://polarisproject.org/recognizing-human-trafficking/>

¹¹¹ <https://www.ecpatusa.org/hotel-training>. ECPAT reports that, of hotel employees who receive training on sex trafficking, 84% have increased awareness of these events compared with 16% of untrained employees. See <https://www.ecpatusa.org/novacancy>. See also Sex Trafficking in the Tourism Industry, J. Tourism Hospit. 2015, link at <https://www.longdom.org/open-access/sex-trafficking-in-the-tourism-industry-2167-0269-1000166.pdf>

¹¹² <https://www.ahla.com/issues/human-trafficking>

Hospitality would have known of Jane Doe's trafficking at Motel 6 Norcross and would have been in a position to prevent the trafficking of Jane Doe T.M.

93. Despite the obvious signs of sex trafficking at the Motel 6 Norcross, Jane Doe T.M.'s trafficker was allowed to continue to use Motel 6 Norcross as the venue for Jane Doe T.M.'s violent sexual exploitation and trafficking. Adequate training would have prevented Jane Doe T.M.'s trafficking.

94. There was also heavy foot traffic in and out of Jane Doe T.M.'s room involving men who were not hotel guests. Jane Doe T.M. had approximately thirty (30) to forty (40) men a day sexually exploiting her at Motel 6 Norcross. These individuals entered and left at unusual hours and were present at the hotel for brief periods of time, which are sign of sex trafficking. Had Defendant G6 Hospitality enforced the policies and procedures they enacted to prevent trafficking from occurring within their Motel 6 branded hotels after observing an obvious sign of trafficking as described above, Jane Doe T.M.'s trafficking would have been identified and reported, which would have prevented her trafficking at Motel 6.

G6 Hospitality Had Actual Knowledge of the Sex Trafficking Venture

95. Based upon public reporting, investigations, criminal incidents, hotel reviews and comments, G6 Hospitality had actual knowledge of pervasive and continuous sex trafficking throughout the Hotel Industry, its franchised and owned hotel properties (including Motel 6 Norcross), and knowingly chose to facilitate sex trafficking at its locations, including Motel 6 Norcross, and benefited from its participation in a sex trafficking venture. G6 Hospitality's knowledge went well beyond its general awareness of sex trafficking in the hospitality industry; it had actual knowledge of the sex trafficking venture carried on at Motel 6 Norcross.

96. Motel 6 Norcross staff, the “boots on the ground,” observed the signs of sex trafficking present before, during, and after Jane Doe T.M.’s trafficking at Motel 6 Norcross. These employees were purportedly required to relay their knowledge of Jane Doe T.M.’s sex trafficking to G6 Hospitality. Thus, all Defendants knew or should have known about Jane Doe T.M.’s sex trafficking.

97. Moreover, the knowledge of the Motel 6 Norcross staff, including its management-level employees, is imputed to Defendants as corporate knowledge and therefore, all Defendants knew or should have known that Jane Doe T.M. was being trafficked in the Motel 6 Norcross.

G6 Hospitality, as Franchisor, Set Standards for Franchisee

98. Franchisee was and is at all material times required to comply with franchise agreement standards, policies, and rules, including those related to security, kidnapping, the trafficking of persons and/or compelled prostitution, if any, promulgated by G6 Hospitality.

99. In addition to brand recognition, a marketing organization, hotel listings in the Global Distribution System (GDS) and other online travel agency databases, the brand provides the franchise hotel with access to its brand wide central reservation system, 800 number, revenue management tools, world-class loyalty programs and a website. Thus, booking and room reservations are controlled by G6 Hospitality.¹¹³

¹¹³ Ellen Meyer, The Origins and Growth of Franchising in the Hotel Industry, LODGING MAGAZINE (April 10, 2018) <https://lodgingmagazine.com/the-origins-and-growth-of-franchising-in-the-hotel-industry/>.

100. G6 Hospitality required Franchisee to adhere to consistent standard regarding the day-to-day operations of the Motel 6 Norcross and exercised control over the means, methods, and tools used by Franchisee.

101. G6 Hospitality exercises control over its Franchisee to ensure quality control by conducting annual on-site inspections to confirm its policies and procedures are complied with.

102. G6 Hospitality exercises control over decisions related to payment options for rooms, including but not limited to allowing payment by cash or pre-paid credit card.

103. G6 Hospitality exercises an ongoing right of control over its hotels, including but not limited to Franchisee, through at least one or more of the following actions:

- a. hosting online bookings on G6 Hospitality's domain;
- b. requiring G6 Hospitality branded hotels to use G6 Hospitality's customer rewards program;
- c. setting employee wages;
- d. advertising employment positions at its franchised hotels;
- e. sharing profits;
- f. standardized training methods for employees;
- g. building and maintaining the facility in a specified manner;
- h. standardized or strict rules of operation;
- i. regular inspection of the facility and operation;
- j. fixing prices;
- k. security policies and procedures;
- l. interior and exterior design decisions; and

m. other actions that deprive Motel 6 branded hotels of independence in their business operations

104. Franchisee was an actual agent of G6 Hospitality with respect to the operation of the Motel 6 Norcross.

105. G6 Hospitality retained control over the details and methods of aspects of the operation of the Motel 6 Norcross that are directly relevant to the proliferation of sex trafficking at that property. As a result of this retained control and its direct involvement, G6 Hospitality participated in a venture with sex traffickers who were using the G6 Hospitality as a venue for their trafficking. Moreover, as a result of this retained control, G6 Hospitality had both the opportunity and the duty to prevent Jane Doe's trafficking.

106. G6 Hospitality retained control over the training of the staff of Motel 6 Norcross regarding human trafficking and ways to detect and respond to signs of human trafficking. Effective training and education are the most important tools to prevent use of hotel facilities for sexual exploitation and human trafficking. If G6 Hospitality had exercised reasonable diligence in providing training, G6 Hospitality would have prevented the Motel 6 Norcross from being used to facilitate obvious and apparent sex trafficking, including the trafficking of Jane Doe T.M. By failing to take reasonable steps to provide appropriate training, despite the overwhelming evidence it had of an ongoing problem with use of its branded properties for sex trafficking, G6 was negligently facilitating sex trafficking.

Defendants Knowingly Benefitted from Jane Doe T.M.'s Sex Trafficking

107. Defendants knowingly received substantial financial benefit from Jane Doe T.M.'s traffickers, including but not limited to revenue generated from room rental and other ancillary

expenses at the Motel 6 Norcross. Thus, Defendants benefited directly from providing support to Jane Doe T.M.'s traffickers, who Defendants knew or should have known were engaged in illegal sex trafficking.

108. Franchisee intentionally or knowingly benefited through increased revenue from rooms rented to Jane Doe T.M.'s traffickers.

109. G6 Hospitality intentionally or knowingly benefited from participating in a venture that traffics another person by, among other things, receiving financial benefits from the trafficking venture at their corporate headquarters in Carrollton, Texas. For every room rented, a percentage is sent by G6's operating company (for G6 owned properties) or the franchisee (for franchised properties) to Defendants at their corporate headquarters in Carrollton, Texas.

110. G6 Hospitality directly participated in renting rooms from and through the actions of its corporate headquarters. In addition to brand recognition, a marketing organization, hotel listings in the Global Distribution System (GDS) and other online travel agency databases, Franchisor requires Franchisee to utilize its brand wide central reservation system, 800 number, revenue management tools, world-class loyalty programs and a website. Thus, booking and room reservations are controlled by G6 Hospitality.¹¹⁴

111. Franchisee and G6 Hospitality participated in renting rooms through the acts of the staff of Motel 6 Norcross who are joint employees of Franchisee and G6 Hospitality because Franchisee and G6 Hospitality jointly exercise control over the terms and conditions of their employment.

¹¹⁴ Ellen Meyer, *The Origins and Growth of Franchising in the Hotel Industry*, LODGING MAGAZINE (April 10, 2018) <https://lodgingmagazine.com/the-origins-and-growth-of-franchising-in-the-hotel-industry/>.

112. As a result of the monies paid by Jane Doe T.M.'s traffickers to the secure rooms for her trafficking at Motel 6 Norcross, all Defendants knowingly benefitted from participating in the venture that they knew or should have known trafficked, harbored, and maintained Jane Doe T.M.'s trafficking at Motel 6 Norcross.

A. CAUSE OF ACTION AGAINST HOTEL DEFENDANTS

VIOLATION OF THE TVPRA, 18 U.S.C. §1595 (AGAINST ALL DEFENDANTS)

113. Jane Doe T.M. adopts and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as fully set forth herein.

114. Jane Doe T.M. is a victim within the meaning of 18 U.S.C. 1595(a). Jane Doe T.M. has suffered substantial physical and psychological injuries and other damages as a result of being trafficked at the Motel 6 Norcross.

115. Defendants are also liable as beneficiaries within the meaning of 18 U.S.C. § 1595(a) because, as described above, each Defendant knowingly benefitted, by receiving financial and other compensation, for their participation in a venture they knew or should have known was engaged in sex trafficking, in violation of the TVPRA, 18 U.S.C. § 1591, et seq. Defendants knew that their repeated failures to address known risks of human trafficking at their hotel properties, and to continue providing venues for sex trafficking, would increase the overall volume of illegal commercial sexual exploitation and victimization at their hotel properties. Defendants further knew or should have known that their acts and omissions were advancing the trafficker's sale and victimization of Jane Doe T.M. for commercial exploitation.

116. Each and every one of Defendants knowingly received the following financial benefits as the result of participating in a venture they knew or should have known was engaged in sex trafficking:

- a. Profit from renting rooms to those looking to sexually exploit Jane Doe T.M. and other human trafficking victims;
- b. Increased profit margins due to lower operation cost by refusing to implement proper training of the Hotel Defendants' employees and managers regarding the signs of human trafficking and the exploitation of victims;
- c. Increased profit margins due to lower operation cost by refusing to hire qualified security officers who would actively combat human trafficking and the exploitation of victims;
- d. Increased profit margins as a result of continued customer loyalty by traffickers and johns who sought to exploit victims, including Jane Doe T.M., due to Hotel Defendants' lack of measures against the exploitation of victims and human trafficking. This customer loyalty led to continued alcohol, food, and room sales;
- e. Increased profit margins as a result of presenting a more "marketable brand" to traffickers and johns looking to exploit victims—which in turn leads to higher alcohol, food, and room sales when these traffickers and johns visit Hotel Defendants' property; and
- f. Increased profit margins by knowingly catering to the needs of a criminal sub-culture that is looking for locations that will not actively enforce laws against human trafficking and the exploitation of victims or take active security measures to prevent human trafficking and the exploitation of victims on their property.
- g. Other direct and indirect benefits of both a financial and non-financial nature to be proven at trial.

117. Each and every Defendant participated in a venture with, among others, Jane Doe T.M.'s traffickers. Defendants had an association in fact with Jane Doe T.M.'s trafficker. Despite the fact that Defendants knew or should have known that he was engaged in sex trafficking in

violation of the TVPRA, Jane Doe T.M.'s trafficker was able to continue renting rooms for the exploitation of Jane Doe T.M. Traffickers, including the trafficker of Jane Doe T.M., frequently used the Motel 6 Norcross because they knew that staff members looked the other way despite obvious signs of trafficking and that Defendants failed to adopt and implement policies to detect and stop trafficking. Thus, there was an implicit agreement between the traffickers and Defendants and their employees and agents, including the staff of the Motel 6 Norcross. Each of the venturers shared a common purpose – the rental of hotel rooms and the making of profits. Each Defendant profited while Jane Doe T.M.'s trafficker was able to rent a secure venue to earn profits by trafficking Jane Doe T.M. Each Hotel Defendant took affirmative actions in furtherance of the venture by continually renting rooms to sex traffickers including but not limited to Jane Doe T.M.'s trafficker, failing to properly implement anti-trafficking rules and policies, and assisting traffickers to continue their sexual exploitation with minimal risk of detection and disturbance, all the while ignoring the obvious signs of Jane Doe T.M.'s trafficking.

118. Despite the fact that they knew or should have known about the atrocities occurring on their properties, Defendants kept receiving benefits from the rental of its rooms to traffickers. As a result of Defendants' choice to receive such benefits, many victims, including Jane Doe T.M., were trafficked and exploited on the properties of the Defendants. This provided a venue for trafficking and constitutes participation by Defendants in a venture under the TVPRA.

119. Defendants committed each of these violations directly, through their own acts and omissions, and through the acts and omissions of their agents and subagents, including the staff of the Motel 6 Norcross.

120. Defendants are jointly and severally liable for the entire amount of damages awarded by a jury in this case under the TVPRA.

VIOLATION OF THE to O.C.G.A. § 51-1-56 (AGAINST ALL DEFENDANTS)

121. The Plaintiff adopts and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as fully set forth herein.

122. At all relevant times, the Plaintiff is a victim within the meaning of O.C.G.A. § 51-1-56(b).

123. At all relevant times, Defendants were perpetrators within the meaning of O.C.G.A. § 51-1-56(a)(2).

199. The Plaintiff is a survivor of sex trafficking within the meaning of O.C.G.A. § 51-1-56 and is entitled to bring a civil action under O.C.G.A. § 51-1-56(b) against any individual or entity whose violations of the O.C.G.A. § 51-1-56 proximately caused the Plaintiff to sustain physical and psychological injuries. Jane Doe T.M. has suffered substantial physical and psychological injuries, and other damages, as a result of being trafficked at the Motel 6 Norcross.

124. Defendants knowingly benefited from participating in a venture which they knew or should have known was engaged in illegal sex trafficking in violation of the O.C.G.A. § 51-1-56(b), by *inter alia*, engaging in acts and omissions that were intended to support, facilitate, harbor, and otherwise further the trafficker's sale and victimization of the plaintiff for commercial exploitation. Defendants knew that their repeated failures to address known risks of human trafficking on their hotel properties would increase the overall volume of illegal commercial sexual exploitation and victimization at their hotel properties. Defendants knowingly benefited from

facilitating the activities of traffickers who Defendants knew or should have known were involved in a violation of O.C.G.A. § 16-5-46.

125. Each and every one of the Defendants knowingly received the following financial benefits as the result of participating in a venture they knew or should have known was engaged in sex trafficking, including the sex trafficking of Jane Doe T.M.:

- a. Profit from renting rooms to those looking to sexually exploit Jane Doe T.M. and other human trafficking victims;
- b. Increased profit margins due to lower operation cost by refusing to implement proper training of the Hotel Defendants' employees and managers regarding the signs of human trafficking and the exploitation of victims;
- c. Increased profit margins due to lower operation cost by refusing to hire qualified security officers who would actively combat human trafficking and the exploitation of victims;
- d. Increased profit margins as a result of continued customer loyalty by traffickers and johns who sought to exploit victims, including Jane Doe T.M., due to Hotel Defendants' lack of measures against the exploitation of victims and human trafficking. This customer loyalty led to continued alcohol, food, and room sales;
- e. Increased profit margins as a result of presenting a more "marketable brand" to traffickers and johns looking to exploit victims—which in turn leads to higher alcohol, food, and room sales when these traffickers and johns visit Hotel Defendants' property; and
- f. Increased profit margins by knowingly catering to the needs of a criminal sub-culture that is looking for locations that will not actively enforce laws against human trafficking and the exploitation of victims or take active security measures to prevent human trafficking and the exploitation of victims on their property.
- g. Other direct and indirect benefits of both a financial and non-financial nature to be proven at trial.

126. Each and every Hotel Defendant participated in a venture with, among others, Jane Doe T.M.'s traffickers. Defendants had an association in fact with Plaintiff Jane Doe T.M.'s traffickers. Despite the fact that Defendants knew or should have known that he were engaged in sex trafficking in violation of Georgia Law, Jane Doe T.M.'s trafficker was able to continue renting rooms for the exploitation of Jane Doe T.M. Traffickers, including the trafficker of Jane Doe T.M., frequently used the Motel 6 Norcross because they knew that staff members looked the other way despite obvious signs of trafficking and that Defendants failed to adopt and implement policies to detect and stop trafficking. Thus, there was an implicit agreement between the traffickers and Defendants and their employees and agents, including the staff of the Motel 6 Norcross. Each of the venturers shared a common purpose – the rental of hotel rooms and the making of profits. Each Hotel Defendant profited while Jane Doe T.M.'s trafficker was able to rent a secure venue to earn profits by trafficking Jane Doe T.M. Each Hotel Defendant took affirmative actions in furtherance of the venture by continually renting rooms to sex traffickers including but not limited to Jane Doe T.M.'s trafficker, failing to properly implement anti-trafficking rules and policies, and assisting traffickers to continue their sexual exploitation with minimal risk of detection and disturbance, all the while ignoring the obvious signs of Jane Doe T.M.'s trafficking.

127. Despite the fact that they knew or should have known about the atrocities occurring on their properties, Defendants kept receiving benefits from the rental of its rooms to traffickers. As a result of Defendants' choice to receive such benefits, many victims, including Jane Doe T.M., were trafficked and exploited on the properties of Defendants. This provided a venue for trafficking and constitutes participation by Defendants in a venture under O.C.G.A. § 51-1-56.

128. Defendants committed each of these violations directly, through their own acts and omissions, and through the acts and omissions of their agents, including the staff of the Motel 6 Norcross.

129. Each of the defendants are jointly and severally liable for the entire amount of damages awarded by a jury in this case under O.C.G.A. § 51-1-56.

TOLLING OF LIMITATIONS

218. To the extent Defendants assert an affirmative defense of limitations, Plaintiff alleges that limitations was tolled due to fraudulent concealment. As set out above, Defendants made affirmative misrepresentations regarding its alleged efforts to combat human trafficking when in fact they knew these representations were false and knowingly allowed trafficking to occur on their properties and knowingly benefited from the trafficking. Defendants acted with a fixed purpose to conceal the facts necessary for the Plaintiff to know she had a cause of action against them, and Plaintiff did not discover and was not in a position to discover the existence of a cause of action against Defendants until shortly before suit was filed, and certainly not more than ten years before suit was filed.

130. To the extent Defendants assert an affirmative defense of limitations, Plaintiff invokes the discovery rule. At the time Plaintiff was harmed, Plaintiff did not know that she was the victim of human trafficking, that her injury arose from being trafficked at Defendant(s) hotels or that she was a person trafficked as the term is used in O.C.G.A. section 51-1-56 and section 16-5-46, much less that she was being victimized by a human trafficking venture, and she did not discover and was not in a position to discover the legal cause of her injury, and certainly not more than ten years before suit was filed. Moreover, at the time the trafficking occurred, Plaintiff did

not know what “human trafficking” as the term is used in O.C.G.A. section 51-1-56 was, much less that she was being victimized by a human trafficking venture, and she did not discover and was not in a position to discover the existence of a cause of action until shortly before suit was filed, and certainly not more than five years before suit was filed.

131. In addition, to the extent Plaintiff’s claim might otherwise be barred by limitations, limitations should be tolled because Plaintiff could not have reasonably discovered the cause of action, and/or was under a legal disability as described in O.C.G.A. § 9-3-90(b) (or the analogous provision of any other potentially applicable law) within the limitations period due to psychological trauma she suffered as a result of the trafficking.

VIII. E.DAMAGES

132. Plaintiff adopts and re-alleges each paragraph above as if set forth herein. Including the damages specifically alleged above, Jane Doe T.M. seeks the following damages from all Defendants, jointly and severally.

A. Damages for Violation of TVPRA, 18 U.S.C. § 1591 and O.C.G.A. § 51-1-56 Against Defendants.

133. Plaintiff prays for all damages as allowed under Federal and Georgia law including Georgia Civil Practice & Remedies Code including, but not limited to:

- a. actual damages;
- b. mental anguish;
- c. court costs;
- d. reasonable attorney’s fees; and
- e. exemplary damages

134. Plaintiff seeks the award of exemplary damages against Defendants as recoverable under Georgia law and federal law.

135. Plaintiff also requests that the Court award pre-judgment and post-judgment interest in accordance with the prevailing rates of interest under Georgia law.

B. Exemplary Damages Unrestricted for all Defendants for Violations Under O.C.G.A. § 51-12-5.1.

136. Defendants' acts, omissions, and/or commissions outlined above constitute a knowing violation of O.C.G.A. § 16-5-46 and O.C.G.A. § 51-1-56. Therefore, under O.C.G.A. § 51-12-5.1 exemplary damages are proper and unlimited.

IX. JURY DEMAND

In accordance with O.C.G.A. § 9-11-38, Plaintiff hereby makes application for a jury trial and request that this cause be set on the Court's Jury Docket. In support of her application, the appropriate jury fee has been paid to the Clerk at least thirty-days (30) in advance of the trial setting.

X. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this case be set for trial before a jury, and that upon a final hearing of the cause, judgment be entered for Plaintiff against Defendants jointly and severally, for the actual, compensatory, and punitive damages as the evidence may show and the jury may determine to be proper, together with the costs of suit, prejudgment interest, post-judgment interest, and such other and further relief to which Plaintiff may, in law or in equity, show herself to be justly entitled.

Respectfully submitted,

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